REMARKS

The Applicant has received and reviewed the Official Action mailed by the Office on 22 December 2005 (the "Action"). The Applicant submits this paper as a fully-responsive reply thereto, and respectfully requests reconsideration and favorable action on the subject application. Claims 1-22 are pending in the application. The Applicant thanks the Office for a detailed analysis presented in the Action.

Claim Objections

In the Action, the Office objects to claim 1 because of informality. The Applicant has appropriately corrected claim 1.

The Office also objects to claim 3 because of an informality. In particular, the Office states that the phrase "generates a responds" should read "generates a response". (*Office Action of 12/22/05*, p. 3). However, the Applicant respectfully submits that the Applicant's previous response, as filed, did indeed recite the correct phrase: "generates a response". As such, the Applicant requests reconsideration of this objection to claim 3.

Claim Rejections under 35 U.S.C. § 102

Bavadekar

Claims 1, 3-5, 8-10, 12, 14, 15, 17, 19 and 20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2003/0009571 to Bavadekar (hereinafter, "Bavadekar"). The Applicant respectfully traverses the rejections.

Turning to **independent claim 1**, the Applicant respectfully disagrees with the stated rejection, but has nonetheless amended the claim as indicated above in order to further prosecution. The Applicant submits that the specification supports the added subject matter under 35 U.S.C. § 112, 1st paragraph, at least in Paragraph [0018].

For convenience, a portion of independent claim 1 is reproduced here, as it would stand after entry of the above revisions, with emphasis added:

> "a client device interface adapted to receive requests for electronic information from a plurality of remote devices;
>
> a stateless module manager adapted to receive and route said requests from said client device interface; and
>
> a plurality of information modules, wherein said information modules register with said stateless module manager and stateless module manager routes said request to an appropriate one of said plurality of information modules in accordance with a type of information requested; and
>
> wherein said client device interface is adapted to receive a plurality of request types, said request types comprising:
>
> ***on-demand requests***, which are sent to said client device interface by a user of one of said remote devices when said user desires an on-demand response;
>
> ***scheduled requests***, which are sent to said client device interface by said user when said user desires a plurality of scheduled responses from a subscription service provided by one or more of said information modules; ***and***
>
> ***event driven requests***, which are sent to said client device interface from one of said remote devices when certain criteria are met."

In making out a rejection of claim 1, the Office states that Bavadekar anticipates all of the claimed subject matter. (*Office Action of 12/22/05*, p. 4).

The Applicant submits that Bavadekar does not disclose a client device interface "adapted to receive a plurality of request types, said request types

comprising...on-demand requests[,]...scheduled requests[, and]...event driven requests" as recited in amended claim 1. Instead, Bavadekar discusses a transport protocol tunnel connection used to allow clients and servers to exchange messages. (*See, e.g. Bavadekar*, Paragraph [0068]). For at least this reason, the Applicant submits that Bavadekar fails to support a § 102 rejection of claim 1. The Applicant therefore respectfully requests that the §102 rejection be withdrawn.

Dependent claims 3-5 and 8-10 depend from claim 1 and, by virtue of this dependency, the above comments directed to claim 1 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of claim 1, define devices not disclosed by Bavadekar.

Turning to **independent claims 12 and 17,** these claims are amended to clarify further features of the apparatus that are similar to those discussed above in connection with claim 1. Thus, the above comments directed to claim 1 apply equally to claims 12 and 17.

Dependent claims 14-15 and 19-20 depend from one of claims 12 or 17 and, by virtue of this dependency, the above comments directed to claim 1 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of their base claim, define methods and devices not disclosed by Bavadekar.

Peiffer

Claims 1-3 and 10 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2002/0042839 to Peiffer et al. (hereinafter, "Peiffer"). In making out a rejection of **independent claim 1**, the

Office states that Peiffer anticipates all of the claimed subject matter. (*Office Action of 12/22/05*, p. 6-7). The Applicant respectfully disagrees with the rejection, but has nonetheless amended the claim in order to further prosecution.

The Applicant submits that Peiffer does not disclose a client device interface "adapted to receive a plurality of request types, said request types comprising...on-demand requests[,]...scheduled requests[, and]...event driven requests" as recited in amended claim 1. Instead, Peiffer discusses a system for processing HTTP requests made by a client to a server. (*See, e.g. Peiffer*, Paragraph [0020]). For at least this reason, the Applicant submits that Peiffer fails to support a § 102 rejection of claim 1. The Applicant therefore respectfully requests that the §102 rejection be withdrawn.

Dependent claims 2-3 and 10 depend from claim 1 and, by virtue of this dependency, the above comments directed to claim 1 apply equally to these claims. Moreover, these claims recite features that, when taken together with those of claim 1, define devices not disclosed by Peiffer.

Claim Rejections under 35 U.S.C. § 103

Bavadekar in view of Burd

Claims 6, 16 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bavadekar in view of U.S. Patent No. 6,757,900 to Burd et al. (hereinafter, "Burd"). The Applicant respectfully traverses the rejection.

These claims all depend from one of claims 1, 12 and 17. The Office cites Burd as teaching the additional subject matter of these dependent claims. Without conceding that Burd provides the teaching for which it is cited in the Action, the Applicant submits that Burd fails to provide the teaching missing from Bavadekar

that is necessary to support a rejection of base claims 1, 12 and 17. On at least this basis, the Applicant requests reconsideration and withdrawal of the § 103 rejections of claims 6, 16 and 21.

Bavadekar in view of Burd in further view of Hunt

Claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bavadekar in view of Burd in further view of U.S. Patent Publication No. 2002/0087657 to Hunt (hereinafter "Hunt"). The Applicant respectfully traverses the rejection.

This claim depends from claim 1. The Office cites Burd and Hunt as teaching the additional subject matter of this dependent claim. Without conceding that Burd or Hunt provides the teaching for which they are cited in the Action, the Applicant submits that Burd and Hunt fail to provide the teaching missing from Bavadekar that is necessary to support a rejection of claim 1. On at least this basis, the Applicant requests reconsideration and withdrawal of the § 103 rejection of claim 7.

Bavadekar in view of Langseth

Claim 11 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bavadekar in view of U.S. Patent No. 6,741,980 to Langseth et al. (hereinafter, "Langseth"). The Applicant respectfully traverses the rejection.

This claim depends from claim 1. The Office cites Langseth as teaching the additional subject matter of this dependent claim. Without conceding that Langseth provides the teaching for which it is cited in the Action, the Applicant submits that Langseth fails to provide the teaching missing from Bavadekar that is

necessary to support a rejection of claim 1. On at least this basis, the Applicant requests reconsideration and withdrawal of the § 103 rejection of claim 11.

Bavadekar in view of Langseth in further view of Masters

Claims 13 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bavadekar in view of Langseth in further view of U.S. Patent No. 6,374,300 Masters et al. (hereinafter, "Masters"). The Applicant respectfully traverses the rejection.

These claims depend from one of claims 12 and 17. The Office cites Langseth and Masters as teaching the additional subject matter of these dependent claims. Without conceding that Langseth and Masters provide the teaching for which they are cited in the Action, the Applicant submits that Langseth and Masters fail to provide the teaching missing from Bavadekar that is necessary to support a rejection of base claims 12 and 17. On at least this basis, the Applicant requests reconsideration and withdrawal of the § 103 rejections of claims 13 and 18.

Bavadekar in view of Burd in further view of Hunt in further view of Langseth in further view of Masters

Claim 22 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bavadekar in view of Burd, in further view of Hunt, in further view of Langseth, and in further view of Masters. The Applicant respectfully traverses the rejection.

Independent claim 22 recites a stateless module manager that manages requests for electronic information received at a mailbox, comprising (emphasis added):

a registry of information modules;

a module loading function for dynamically loading said information modules upon receipt of said request for electronic information, wherein said request is made as one of a serializable Java object, XML placed in an HTTP header, or an XML-RPC-enabled web server, wherein said request is either synchronous or asynchronous, wherein a synchronous request is handled on a first-in-first-out basis, and wherein an asynchronous request is processed and a response returned in accordance with a processing time of the request;

wherein said stateless module manager routes said request to an appropriate information module for resolution, and wherein said appropriate information module resolves said request and returns a response to said stateless module manager;

wherein said stateless module manager maintains a list of supported services provided by each of said information modules and handles service collisions such that if plural information modules register as supporting a same service by determining which of said plural information modules will handle said request;

wherein instances of said stateless module manger are created each time a new request is received and discarded after the request has been handled;

wherein said stateless module loading function includes local and remote module loading functions, wherein said local loading function loads information modules that reside on a same physical device as said stateless module manager, wherein said remote loading function loads information modules that reside on devices logically connected to said stateless module manager, wherein said local modules communicate with said stateless module manager via one of memory calls, object inheritance, and inter-process communication, and wherein said remote information modules communicate with said stateless module manager via TCP/IP sockets; and

further comprising a user interface, wherein said user interface is adapted to configure said stateless module manager[[.]]; and

wherein said stateless module manager is adapted to receive a plurality of request types, said request types comprising:

on-demand requests, which are sent by a user of one of said remote devices when said user desires an on-demand response;

scheduled requests, which are sent by said user when said user desires a plurality of scheduled responses from a subscription service provided by one or more of said information modules; and

event driven requests, which are sent from one of said remote devices when certain criteria are met.

In making out a rejection of this claim, the Office states that the subject matter is rendered obvious in view of the combination of Bavadekar, Burd, Hunt, Lanseth and Masters. Specifically, the Office directs the Applicant to "see the combined rejections for claims 1, 3, 6, 8-10 and 13 above." (*Office Action of 12/22/05*, p. 12). The Applicant respectfully disagrees with the rejections.

The Applicant first submits that the Office has failed to state a *prima facie* case of obviousness. In making a rejection of claim 22, the Office fails to state that any of the cited references teach any of the language emphasized above. The Applicant notes that while some of this subject matter may be similar to other rejected dependent claims (not listed in the rejection of claim 22), some of this subject matter is unique to claim 22. Specifically, the Office has failed to show, anywhere in the Action, how any reference discloses, teaches or suggests "a module loading function for dynamically loading said information modules upon

receipt of said request for electronic information". Furthermore, the Office has failed to show any how any reference discloses, teaches, or suggest "wherein said request is made as one of a serializable Java object, *XML placed in an HTTP header, or an XML-RPC-enabled web server*".

For at least this reason, the Office has failed to state a *prima facie* case of obviousness. The Applicant therefore respectfully requests that the §103 rejection be withdrawn.

Even so, the Applicant also submits that none of the cited references disclose, teach or suggest a stateless module manager "adapted to receive a plurality of request types, said request types comprising...on-demand requests[,]...scheduled requests[, and]...event driven requests" as recited in amended claim 22, and as discussed above in regards to claim 1. For at least this additional reason, the Applicant respectfully requests that the §103 rejection be withdrawn.

Conclusion

The Applicant respectfully requests reconsideration and withdrawal of the rejections of claims 1-22 and favorable action on the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

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By: _____

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